

# EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

\_\_\_\_\_  
JOANNA ESPINAL and RAMONA DE LEON

INDEX NO

PLAINTIFF,

-against-

VERIFIED COMPLAINT

JET BLUE AIRWAYS CORPORATION,  
27-01 QUEENS PLAZA  
LONG ISLAND CITY, NY 11191

DEFENDANT (S)  
\_\_\_\_\_X

PLAINTIFF, by and through his attorney, Nestor Rosado, Esq, as and for their Complaint against defendants, hereby states, upon information and belief, as follows:

**FIRST CAUSE OF ACTION FOR WRONGFUL REMOVAL  
FROM AIRPLANE**

1. *That the Plaintiffs purchased airline tickets on JANUARY 14, 2020 to travel to the United State, on flight NUMBER 2536, FROM THE Santiago, Dominican Republic on Jet Blue Airways.*
2. *That the Plaintiffs boarded the airplane with proper personal on-board luggage, which they had paid extra to have in the plane.*
3. *That the Plaintiffs were seated in the front row seats, which they had paid extra fee. They were removed from airplane without justification for any reason.*
4. *That the airline failed to provide a valid reason for their removal and the justification for their removal. The Plaintiff's had paid extra to carry personal bags on board on the plane but had to agree to place them under the plane in the regular baggage compartment. The Plaintiff's family had lost personal property on a previous flight, that*

*is why they paid extra to store bags in the front of the plane. They reported the theft of \$3,000 from their bags.*

*5. That the Plaintiff's agreed to place personal bags to lower level of the plane but they were removed from the plane.*

*6. That the Plaintiffs suffered a personal embarrassment and discrimination based upon National Origin and Race, because no legitimate reason for removal was provided by the airline for their removal from the airplane.*

*7. That because of this baseless action the plaintiffs suffered damages in the amount of One Hundred Thousand Dollars of One Hundred Thousand Dollars*

***SECOND CAUSE OF ACTION FOR DISCRIMINATION BASED UPON  
NATIONAL ORIGIN AND RACE***

*8. That the plaintiffs were removed from the airplane without any legitimate reason and without any legal justification and passed upon National Origin and Race in violation of their rights.*

*9. That the Plaintiffs are demanding damages in the amount of One Hundred Thousand Dollars and cost for prosecuting this action.*

**Wherefore the Plaintiff demands a Judgment in the First and Second Cause of Actions and for such other relief as this Court may deem just and proper.**

Dated: May 21, 2021  
New York, NY

**To: Michael Bojbasa, Esq  
Attorney for Defendant  
Jetblue Airways Corporation  
888 Seventh Avenue 9<sup>th</sup> Floor  
New York, New York 10106**

  
Nestor Rosado, Esq.

2022

My Commission Expires March 18  
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